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June 25, 2008

Via Facsimile (212) 805-6737

The Honorable George B. Daniels
 U.S. District Court, Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl St., Room 630
 New York, NY 10007

SO ORDERED

The conference is adjourned to
 September 16, 2008 at 9:30 a.m.

George B. Daniels
HON. GEORGE B. DANIELS JUN 26 2008

Re: Desiree Juan v. Land America Financial Group, Inc.
 07 CV 7828 (GBD)

Dear Judge Daniels:

We write on behalf of all parties in the above-referenced matter to jointly request a brief extension of the discovery deadline.

The discovery deadline is currently scheduled for July 10, 2008.

The deposition of Plaintiff Desiree Juan has already been completed. In an effort to settle this matter, the parties have presently scheduled a mediation with JAMS for July 1, 2008. In the event that the scheduled mediation is unsuccessful, the parties respectfully request that the discovery cutoff be extended to September 5, 2008. The parties further respectfully request that the conference presently scheduled for August 14, 2008, be rescheduled for a time that is convenient for the Court immediately following the September 5, 2008 date. At this conference, the parties expect to be able to discuss post discovery procedures such as the date by which dispositive motions shall be made as well as expert disclosure and any other issue the Court deems appropriate.

We thank the Court for its consideration of this matter.

Respectfully submitted,

Matthew T. Schatz
 Matthew T. Schatz, Esq. (MS 5979)

cc: Robert S. Whitman, Esq. (via E-mail)